

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

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[Response to Docket # 17640]

**JOINT INFORMATIVE MOTION OF DISCOVERY DISPUTE BETWEEN INDIVIDUAL
GO BONDHOLDER (ARTHUR SAMODOVITZ) AND THE FOMB/FAFAA**

Dated: September 20, 2021

The Court is hereby notified of a discovery dispute between Arthur Samodovitz, individual bondholder of the 2014 Puerto Rico GO Bonds, and the Financial Oversight and Management Board for Puerto Rico ("FOMB") and the Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF", and together with the FOMB, the "Government Parties") regarding the Second Set of Requests for Production of Documents and Interrogatories propounded by Arthur Samodovitz, and a presumed discovery dispute between the same parties regarding the Third Set of Requests for Production of Documents and Interrogatories propounded by Arthur Samodovitz.

Arthur Samodovitz served his (first) Set of Requests for Production of Documents and Interrogatories on the Government Parties by email the evening of Friday 8/27/2021 and Arthur Samodovitz promptly withdrew them on Sunday 8/29/2021 when he saw a public document that provided some of the requested information.

Arthur Samodovitz served his Second Set of Requests for Production of Documents and Interrogatories on the Government Parties on Monday 9/6/2021. On Monday 9/13/2021, the Government Parties served their responses and objections to the

Requests for Production of Documents in the Second Set for a variety of reasons including relevance. A discovery conference was held on Tuesday 9/14/2021 and the parties could not agree on the issue of relevance. However, the Government Parties requested until Friday 9/17/2021 to look for publicly available documents that would satisfy these requests. The parties agreed that, if Arthur Samodovitz believed the parties were at impasse after the Government Parties' response on Friday 9/17/2021, there would be a hearing. On Friday, 9/17/2021 the Government Parties reported that they found no publicly available documents that responded to the Requests for Production of Documents in the Second Set, and therefore, stood by their 9/13/2021 responses and objections.

On Thursday 9/16/2021, the Government Parties also served their responses and objections to the Interrogatories in the Second Set which requested similar information as that contained in documents requested in the Requests for Production of Documents in the Second Set, and Arthur Samodovitz requested a discovery conference on Friday 9/17/2021. The Government Parties instead recommended a hearing for both the Requests for Production of Documents and Interrogatories in the Second Set because their responses and objections to the Interrogatories were consistent with those to the Requests for Production of Documents. On Monday 9/20/2021, Stephanie Caruso scheduled the hearing for Friday 9/24/2021.

On Thursday 9/16/2021, Arthur Samodovitz also served a Third Set of Requests for Production of Documents and Interrogatories by email on the Government Parties. This Third Set is directed to similar issues as the Second Set. The response to the Requests for Production of Documents in the Third Set is due Thursday 9/23/2021, and the Interrogatories in the Third Set request similar information as in the Requests for Production of Documents in the Third Set. The Government Parties' responses to the Third Set of Requests for Production of Documents and Interrogatories are not yet due. Mr. Samodovitz believes it would be expeditious to consider both the Second and Third Sets in the same hearing.

September 20, 2021

Respectfully Submitted, /s/ Arthur Samodovitz, pro se.
Arthur Samodovitz, Individual Bondholder
120 Lasa Commons Circle #213, St. Augustine, FL 32084
904-878-4026 ArthurSsails@gmail.com

/s/ Brian S. Rosen

Martin J. Bienenstock (*pro hac vice*)

Brian S. Rosen (*pro hac vice*)

Margaret A. Dale (*pro hac vice*)

Julia D. Alonzo (*pro hac vice*)

Laura Stafford (*pro hac vice*)

PROSKAUER ROSE LLP

Eleven Times Square

New York, NY 10036

Tel: (212) 969-3000

Fax: (212) 969-2900

*Attorneys for the Financial Oversight and
Management Board, as representative for the
Debtors*

/s/ Hermann D. Bauer

Hermann D. Bauer

USDC No. 215205

O'NEILL & BORGES LLC

250 Muñoz Rivera Ave., Suite 800

San Juan, PR 00918-1813

Tel: (787) 764-8181

Fax: (787) 753-8944

*Co-Attorneys for the Financial
Oversight and Management Board, as
representative for the Debtors*

O'MELVENY & MYERS LLP

/s/ Peter Friedman

John J. Rapisardi

(Admitted *Pro Hac Vice*)

7 Times Square

New York, NY 10036

Tel: (212) 326-2000

Fax: (212) 326-2061

Email: jrapisardi@omm.com

Peter Friedman

(Admitted *Pro Hac Vice*)

1625 Eye Street, NW

Washington, DC 20006

Tel: (202) 383-5300

Fax: (202) 383-5414

Email: pfriedman@omm.com

Elizabeth L. McKeen

(Admitted *Pro Hac Vice*)

Ashley M. Pavel

(Admitted *Pro Hac Vice*)

610 Newport Center Drive, 17th Floor

Newport Beach, CA 92660

Tel: +1-949-823-6900

Fax: +1-949-823-6994

Email: emckeen@omm.com

apavel@omm.com

*Attorneys for the Puerto Rico Fiscal Agency
and Financial Advisory Authority*

/s/ Luis C. Marini-Biaggi

Luis C. Marini-Biaggi

USDC No. 222301

Email: lmagini@mpmlawpr.com

Carolina Velaz-Rivero

USDC No. 300913

Email: cvelaz@mpmlawpr.com

MARINI PIETRANTONI MUÑIZ LLC

250 Ponce de León Ave., Suite 900

San Juan, Puerto Rico 00917
Tel: (787) 705-2171
Fax: (787) 936-7494

*Co-attorneys for the Puerto Rico Fiscal
Agency and Financial Advisory Authority*